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EDICT OF GOVERNMENT



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COMESA 008 (2004) (English): Standard for
Quick Frozen Fish Sticks (Fish Fingers), Fish
Portions and Fish Fillets - Breaded or in
Batter



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COMESA HARMONISED
STANDARD

COMESA/FDHS
008:2004

**Standard for Quick Frozen Fish Sticks (Fish
Fingers), Fish Portions and Fish Fillets -
Breaded or in Batter**

**CODEX STANDARD FOR QUICK FROZEN FISH STICKS
(FISH FINGERS), FISH PORTIONS
AND FISH FILLETS - BREADED OR IN BATTER**

CODEX STAN 166 - 1989, REV 1-1995

1 Scope

This standard applies to quick frozen fish sticks (fish fingers) and fish portions cut from quick frozen fish flesh blocks, or formed from fish flesh, and to natural fish fillets, breaded or batter coatings, singly or in combination, raw or partially cooked and offered for direct human consumption without further industrial processing.

2 Description

2.1 Product definition

2.1.1 A fish stick (fish finger) is the product including the coating weighing not less than 20 g and not more than 50 g shaped so that the length is not less than three times the greatest width. Each stick shall be not less than 10 mm thick.

2.1.2 A fish portion including the coating, other than products under 2.1.1, may be of any shape, weight or size.

2.1.3 Fish sticks or portions may be prepared from a single species of fish or from a mixture of species with similar sensory properties.

2.1.4 Fillets are slices of fish of irregular size and shape which are removed from the carcass by cuts made parallel to the back bone and pieces of such fillets, with or without the skin.

2.2 Process definition

The product after any suitable preparation shall be subjected to a freezing process and shall comply with the conditions laid down hereafter. The freezing process shall be carried out in appropriate equipment in such a way that the range of temperature of maximum crystallization is passed quickly. The quick freezing process shall not be regarded as complete unless and until the product temperature has reached -18°C or colder at the thermal centre after thermal stabilization. The product shall be kept deep frozen so as to maintain the quality during transportation, storage and distribution.

Industrial repacking or further industrial processing of intermediate quick frozen material under controlled conditions which maintains the quality of the product, followed by the re-application of the quick freezing process, is permitted.

2.3 Presentation

Any presentation of the product shall be permitted provided that it:

2.3.1 meets all the requirements of the standard, and

2.3.2 is adequately described on the label to avoid confusing or misleading the consumer.

3 Essential composition and quality factors

3.1 Raw material

3.1.1 Fish

Quick frozen breaded or battered fish sticks (fish fingers) breaded or battered fish portions and breaded or battered fillets shall be prepared from fish fillets or minced fish flesh, or mixtures thereof, of edible species which are of a quality such as to be sold fresh for human consumption.

3.1.2 Coating

The coating and all ingredients used therein shall be of food grade quality and conform to all applicable Codex standards.

3.1.3 Frying fat (oil)

A fat (oil) used in the cooking operation shall be suitable for human consumption and for the desired final product characteristic (see also Section 4).

3.2 Final product

Products shall meet the requirements of this standard when lots examined in accordance with Section 9 comply with the provisions set out in Section 8. Products shall be examined by the methods given in Section 7.

3.3 Decomposition

The products shall not contain more than 10 mg/100 g of histamine based on the average of the sample unit tested. This shall apply only to species of *Clupeidae*, *Scombridae*, *Scombresocidae*, *Pomatomidae* and *Coryphaenidae* families.

4 Food additives

Only the use of the following additives is permitted.

Additive	Maximum level in the final product
For Fish Fillets and Minced Fish Flesh Only	
Moisture/Water Retention Agents	10 mg/kg expressed as P ₂ O ₅ , singly or in combination (includes natural phosphate)
339(i) Monosodium orthophosphate	
340(i) Monopotassium orthophosphate	
450(iii) Tetrasodium diphosphate	
450(v) Tetrapotassium diphosphate	
451(i) Pentasodium triphosphate	
451(ii) Pentapotassium triphosphate	
452(i) Sodium polyphosphate	
452(v) Calcium, polyphosphates	
401 Sodium alginate	GMP
Antioxidants	GMP
300 Ascorbic acid	
301 Sodium ascorbate	

303 Potassium ascorbate 304 Ascorbyl palmitate 1 g/kg	
In Addition, for Minced Fish Flesh Only Acidity Regulator 330 Citric acid 331 Sodium citrate 332 Potassium citrate	GMP
Thickeners 412 Guar gum 410 Carob bean (Locust bean) gum 440 Pectins 466 Sodium carboxymethyl cellulose 415 Xanthan gum 407 Carrageenan and its Na, K, NH ₄ salts (including Furcelleran) 461 Methyl cellulose	GMP
Food Additives for Breaded or Batter Coatings Leavening Agents 431(i) Monocalcium orthophosphate 431(ii) Dicalcium orthophosphate 541 Sodium aluminium phosphate, basic and acidic	1 g/kg expressed as P ₂ O ₅ , singly or in combination
500 Sodium carbonate 501 Potassium carbonate 502 Ammonium carbonate	GMP
Flavour Enhancers 621 Monosodium glutamate 622 Monopotassium glutamate	GMP
Colours 160b Annatto extracts	20 mg/kg expressed as bixin
150a Caramel I (plain)	GMP
160a β -Carotene (Synthetic) 160e β -apo-8'-carotenal	100 mg/kg singly or in combination
<u>Thickeners</u> 412 Guar gum 410 Carob bean (Locust bean) gum 440 Pectins 466 Sodium carboxymethyl cellulose 415 Xanthan gum 407 Carrageenan and its Na, K, NH ₄ salts (including Furcelleran) 407 Processed Eucheuma Seaweed (PES) 461 Methyl cellulose 410 Sodium alginate 463 Hydroxypropyl cellulose	GMP

464 Hydroxypropyl methylcellulose	
465 Methylethylcellulose	
Emulsifiers	GMP
471 Monoglycerides of fatty acids	
322 Lecithins	
Modified Starches	GMP
1401 Acid treated starches (including white and yellow dextrins)	
1402 Alkaline treated starches	
1404 Oxidized starches	
1410 Monostarch phosphate	
1412 Distarch phosphate, esterified	
1414 Acetylated distarch phosphate	
1413 Phosphated distarch phosphate	
1420/1421 Starch acetate	
1422 Acetylated distarch adipate	
1440 Hydroxypropyl starch	
1442 Hydroxypropyl starch phosphate	

5 Hygiene and handling

5.1 The final product shall be free from any foreign material that poses a threat to human health.

5.2 When tested by appropriate methods of sampling and examination prescribed by the Codex Alimentarius Commission (CAC), the product:

- (i) shall be free from microorganisms or substances originating from microorganisms in amounts which may present a hazard to health in accordance with standards established by the Codex Alimentarius Commission;
- (ii) shall not contain histamine that exceeds 20 mg/100 g. This applies only to species of *Clupeidae*, *Scombridae*, *Scombrosocidae*, *Pomatomidae* and *Coryphaenidae* families;
- (iii) shall not contain any other substance in amounts which may present a hazard to health in accordance with standards established by the Codex Alimentarius Commission.

5.3 It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the Recommended International Code of Practice - General Principles of Food Hygiene (CAC/RCP 1-1969, Rev. 3-1997) and the following relevant Codes:

- (i) the Recommended International Code of Practice for Frozen Fish (CAC/RCP 16-1978);
- (ii) the Recommended International Code of Practice for Frozen Battered and/or Breaded Fishery Products (CAC/RCP 35-1985);
- (iii) the Recommended International Code of Practice for Minced Fish Prepared by Mechanical Separation (CAC/RCP 27-1983).
- (iv) The Recommended International Code of Practice for the Processing and Handling of Quick Frozen Foods (CAC/RCP 8-1976).

6 Labelling

In addition to Sections 2, 3, 7 and 8 of the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 3-1999) the following specific provisions apply:

6.1 The name of the food

6.1.1 The name of the food to be declared on the label shall be "breaded" and/or "battered", "fish sticks" (fish fingers), "fish portions", or "fillets" as appropriate or other specific names used in accordance with the law and custom of the country in which the food is sold and in a manner so as not to confuse or mislead the consumer.

6.1.2 The label shall include reference to the species or mixture of species.

6.1.3 In addition there shall appear on the label either the term "quick frozen" or the term "frozen" whichever is customarily used in the country in which the food is sold, to describe a product subjected to the freezing processes as defined in subsection 2.2.

6.1.4 The label shall show whether the products are prepared from minced fish flesh, fish fillets or a mixture of both in accordance with the law and custom of the country in which the food is sold and in a manner so as not to confuse or mislead the consumer.

6.1.5 The label shall state that the product should be maintained under conditions that will maintain the quality during transportation, storage and distribution.

6.2 Storage instructions

The label shall include terms to indicate that the product shall be stored at a temperature of -18°C or colder.

6.3 Labelling of non-retail containers

Information specified above shall be given either on the container or in accompanying documents, except that the name of the food, lot identification, and the name and address of the manufacturers or packer, as well as storage instructions, shall always appear on the container. However, lot identification, and the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.

7 Sampling, examination and analysis

7.1 Sampling

(i) Sampling of lots for examination of the product shall be in accordance with the FAO/WHO Codex Alimentarius Sampling Plans for Prepackaged Foods (AQL-6.5) CAC/RM 42-1969. For prepackaged goods the sample unit is the entire container. For products packed in bulk the sample unit is at least 1 kg of fish sticks (fish finger), fish portions or fillets.

(ii) Sampling of lots for examination of net weight shall be carried out in accordance with an appropriate sampling plan meeting the criteria established by the CAC.

7.2 Determination of net weight

The net weight (exclusive of packaging material) is determined on each whole primary container of each sample representing a lot and shall be determined in the frozen state.

7.3 Sensory and physical examination

Samples taken for sensory and physical examination shall be assessed by persons trained in such examination and in accordance with procedures elaborated in Sections 7.4 through 7.7, Annex A and the *Guidelines for the Sensory Evaluation of Fish and Shellfish in Laboratories* (CAC/GL 31 - 1999).

7.4 Estimation of fish core

According to A.O.A.C. Method 996.15.

7.5 Determination of gelatinous conditions

According to the AOAC Methods - "Moisture in Meat and Meat Products, Preparation of Sample Procedure"; 983.18 and "Moisture in Meat" (Method A); 950.46; AOAC 1990.

7.6 Estimation of proportion of fish fillets and minced fish flesh

See Annex B.

7.7 Cooking methods

The frozen sample shall be cooked prior to sensory assessment according to the cooking instructions on the package. When such instructions are not given, or equipment to cook the sample according to the instructions is not obtainable, the frozen sample shall be cooked according to the applicable method(s) given below:

Use procedure 976.16 of the A.O.A.C. (15th Edition 1990). It is based on heating product to an internal temperature of 65-70°C. Cooking times vary according to size of product and equipment used. If determining cooking time, cook extra samples, using a temperature measuring device to determine internal temperature.

8 Definition of defectives

The sample unit shall be considered defective when it exhibits any of the properties defined below:

8.1 Foreign matter (cooked state)

The presence in the sample unit of any matter which has not been derived from fish (excluding packing material), does not pose a threat to human health, and is readily recognized without magnification or is present at a level determined by any method including magnification that indicates non-compliance with good manufacturing and sanitation practices.

8.2 Bones (cooked state) (in packs designated boneless)

More than one bone per kg greater or equal to 10 mm in length, or greater or equal to 1 mm in diameter; a bone less than or equal to 5 mm in length, is not considered a defect if its diameter is not more than 2 mm. The foot of a bone (where it has been attached to the vertebra) shall be disregarded if its width is less than or equal to 2 mm, or if it can easily be stripped off with a fingernail.

8.3 Odour and flavour (cooked state)

A sample unit affected by persistent and distinct objectionable odour and flavours indicative of decomposition, or rancidity or of feed.

8.4 Flesh abnormalities

Objectionable textural characteristics such as gelatinous conditions of the fish core together with greater than 86% moisture found in any individual fillet or sample unit with pasty texture resulting from parasites affecting more than 5% of the sample unit by weight.

9 Lot acceptance

A lot shall be considered as meeting the requirements of this standard when:

- (i) the total number of defectives as classified according to Section 8 does not exceed the acceptance number (c) of the appropriate sampling plan in the Sampling Plans for Prepackaged Foods (AQL-6.5) (CAC/RM 42-1977);
- (ii) the average percent fish flesh of all sample units is not less than 50% of the frozen weight;
- (iii) the average net weight of all sample units is not less than the declared weight, provided there is no unreasonable shortage in any container; and
- (iv) the Food Additives, Hygiene and Labelling requirements of Sections 3.3, 4, 5.1, 5.2 and 6 are met.

Annex A

Sensory and physical examination

The sample used for sensory evaluation should not be the same as that used for other examinations.

1. Complete net weight determination, according to defined procedures in Section 7.2.
2. Complete fish core determination on one set of the sample units according to defined procedures in Section 7.4.
3. Complete the estimation of the proportion of fillets and minced flesh, if required.
4. Cook the other set of sample units and examine for odour, flavour, texture, foreign matter, and bones.
5. In cases where a final decision on gelatinous conditions cannot be made in the thawed uncooked state, the disputed material is sectioned from the product and gelatinous condition confirmed by cooking as defined in Section 7.7 or by using the procedure in Section 7.5 to determine if greater than 86% moisture is present in any product unit. If a cooking evaluation is inconclusive, then procedure in 7.5 would be used to make the exact determination of moisture content.

ANNEX B

Estimation of proportion of fish fillets and minced fish flesh

(West European Fish Technologists Association - WEFTA Method)

a) Equipment

Balance, sensitive to 0.1 g

Circular sieve - 200 mm diameter, 2.5 or 2.8 mesh opening (ISO) soft rubber edge (or blunt) spatula, forks, suitable sized plates, water tight plastic bags.

b) Preparation of Samples

Fish Portions/Sticks: Take as many portions as needed to provide a fish core sample of about 200g (2kg). If breaded and/or battered first strip coating according to the method describer in section 7.4.

c) Determination of Weights "A" of the Frozen Fish Samples

Weight the single fish portions/decoated fish cores while they are still frozen. Smaller portions are combined to a sample sub-units of about 200 g (e.g. 10). fish sticks of about 20 g each). Record the weight "A" n of the sub-units. Place the pre-weighed sample sub-units into water tight bags.

d) Thawing

Thaw the samples by immersing the bags into a gently agitated water bath of about 20°C, but not more than 35°C.

e) Draining

After thawing has been completed (duration about 20-30 min.) take each sample unit, one at a time, and drain the exuded fluid (thaw drip) for 2 minuted on a pre-weighed circular sieve incluned at an angle of 17-20 degrees. Remove adhering drip from the bottom of the sieve by use of a paper towel when draining is completed.

f) Determination of weight "B" of the Drained Fish Sample "B" - sieve plus fish minus sieve weight. The difference of "A" - "B" is the weight of exuded fluid - thaw drip.

g) Separation

Place the drained fish core on a plate and separate the minced flesh from the fillet using a fork to hold the fillet flesh and a soft, rubber edge spatula to scrape off the minced flesh.